

1 John A. Conkle (SB# 117849)  
j.conkle@conklelaw.com  
2 Amanda R. Washton (SB# 227541)  
a.washton@conklelaw.com  
3 Desiree J. Ho (SB# 313250)  
d.ho@conklelaw.com  
4 CONKLE, KREMER & ENGEL  
Professional Law Corporation  
5 3130 Wilshire Boulevard, Suite 500  
Santa Monica, California 90403-2351  
6 Phone: (310) 998-9100 • Fax: (310) 998-9109  
7 Attorneys for Defendant Flying Food  
Group, LLC  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11

12 ELIAS YAMIDO, MARK SIBAYAN  
and THELMA YAMIDO, on behalf of  
13 themselves, others similarly  
situated and the general public,  
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Plaintiff,  
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v.  
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FLYING FOOD GROUP, LLC and  
17 DOES 1-10, inclusive,  
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Defendant.  
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CASE No. 3:19-cv-344

**DECLARATION OF LAURA  
BLAND IN SUPPORT OF  
DEFENDANT FLYING FOOD  
GROUP, LLC'S NOTICE OF  
REMOVAL**

Action Filed: December 14, 2018  
Trial Date: None

Case No. 3:19-cv-344

**DECLARATION OF LAURA BLAND**

I, Laura Bland, hereby declare as follows:

1. I am currently employed by Flying Food Group, LLC in the position of Corporate Recruiting Manager. Before I became the Corporate Recruiting Manager, I held the position of Human Resources Manager for Flying Food Group, LLC. I have been employed by Flying Food Group, LLC since January 3, 2014. I make this declaration of facts known to me based upon my position and employment at Flying Food Group, LLC. If called upon, I could and would testify competently to the facts stated herein.

2. I am informed and believe that Flying Food Fare, Inc. wholly owns, and is the sole member of, Flying Food Group, LLC. I am informed and believe that Flying Food Fare, Inc. is a corporation headquartered and incorporated in the State of Illinois.

3. I am informed and believe that Flying Food Group, LLC is a limited liability company organized in the State of Delaware and headquartered in the State of Illinois.

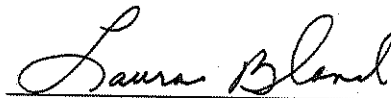
4. I am informed and believe that Flying Food Group, LLC provides payroll services for the facility located at 810 Malcolm Road in Burlingame ("SFO Facility.")

5. I am informed and believe that the average hourly rates for the SFO Facility were as follows: \$14.48 in 2015, \$15.97 in 2016, \$17.28 in 2017, and \$18.59 in 2018. I am informed and believe that the average hourly rate paid to hourly nonexempt employees between 2015 and 2018 was approximately \$16.58. I am informed and believe that approximately 155 employees were terminated in

1 2016, 130 employees were terminated in 2017, and 159 employees were terminated  
2 in 2018.

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4 6. I am informed and believe that in 2018, there were, on average,  
5 approximately 430 employees working at the SFO Facility at any given time. I am  
6 informed and believe that, as of January 17, 2019, there are approximately 427  
7 employees currently employed at the SFO Facility.

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9 I declare under penalty of perjury under the laws of the State of California and  
10 United States of America that the foregoing facts are true and correct, and that this  
11 declaration was executed on January 18, 2019.

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15 Laura Bland  
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